

Exhibit 2

IN THE WESTERN DISTRICT COURT OF VIRGINIA

SINES v. KESSLER

CASE NO.: 3:17-cv-00072

AFFIDAVIT TO APPEAL SANCTIONS

Name: Brooke Heimbach

Occupation: Homemaker

I, Brooke Lauren Heimbach, swear or affirm:

1. Throughout my marriage to Mr. Heimbach, my family had often received death threats in the mail, harassing phone calls, and threatening messages; some of which were directed at me personally and against my children. My former husband worked to protect me as much as possible from the stress related to his political activities and thus I was unaware of the details relating to this lawsuit, including those relating to discovery.
2. My former husband had put an old cellphone, laptop, and a collection of documents in a box in the room that was his workspace, although I was unaware at the time that this related to the Charlottesville case.
3. Mr. Heimbach was blocked by the Orange County Sheriff's Department from contacting me, against my desires and wishes, in March of 2018 after an argument at our former home, located at 120 Paul Street in Paoli, Indiana. This included a ban of messages through third parties, including neighbors and mutual friends.
4. Without the ability to contact Mr. Heimbach and my limited financial resources, I took an offer by my family in Texas to go with my two children for an extended visit. This was for the purpose of allowing the legal process to finish so I could again contact Mr. Heimbach and we could both continue to care for and lovingly raise our children.
5. When my biological father and step-mother arrived from Texas to pick up myself and my children, they brought a small vehicle that could not fit much more than a few items of clothing and ourselves, restricting the items that could be brought.
6. I was informed that Mr. Heimbach could not return to the 120 Paul Street home, even though I was leaving for an extended period and would be ending my lease on the property.
7. I notified my neighbors, Ashley and Robert Edwards, that they had permission to clean out the home in preparation for the home so it could be rented to new tenants, and take the items that they could use for their family. I do not know what happened to items belonging to Mr. Heimbach including his laptop, his former cellphone, and his personal

documents, but I assume that they were thrown out by third parties who also had no knowledge of the lawsuit.

8. Economic sanctions against my former husband would directly harm myself and our two children. I am currently a full-time mother and Mr. Heimbach is the only source of income for myself and my children. He not only has reliably been paying child support but has gone above and beyond those requirements to help support myself and my children to provide for the needs of our children. If Mr. Heimbach had less financial resources, he would be unable to provide the support necessary to enroll our oldest son in pre-school for the upcoming school year and provide necessary aid that I need to manage my household as I am the primary caretaker of our children and work towards gaining additional education so I can be more self sufficient.

Further affiant saith not.

I SWEAR OR AFFIRM THAT THE ABOVE AND FOREGOING REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY INFORMATION, KNOWLEDGE, AND BELIEF.

07/03/2019

Date

Brooke Heimbach

Brooke Heimbach

STATE OF MARYLAND
COUNTY OF MONTGOMERY

I, the undersigned Notary Public, do hereby affirm that Brooke Heimbach personally appeared before me on the 30 day of July 2019, and signed the above Affidavit as her free and voluntary act and deed.

KANYAN ANEH

Notary Public

Exp: 11/13/2020